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DUE
DATE



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

NOV 12 1993

93-DOE-12130

ACTION
DIST. LTR ENC

Dr. Frederick Dowsett, Ph.D., Unit Leader
Monitoring and Enforcement
Hazardous Materials and Waste Management Division
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Mr. Steve Burkett, Chief
Compliance Branch 8WM-C
Water Management Division
U. S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2405

Gentlemen:

On May 19, 1992 the Rocky Flats Office (RFO) met with the Colorado Department of Health (CDH) and the Environmental Protection Agency (EPA) regarding the regulation of precipitation runoff from the 750 and 904 pads at the Rocky Flats Plant (RFP). Resulting from the meeting, an agreement was reached with CDH and EPA that upon completion of specified capital improvements and the institution of new management procedures, listed in Enclosure 1, RFP would no longer be required to collect and treat precipitation runoff from the pads.

All of the specified capital and management improvements have been completed. There was, however, a deviation in the implementation of Item 2 and a clarification of Item 7. Neither impact the intent nor the execution of the agreement; both are explained in Enclosure 2. Therefore, in accordance with our prior agreement, RFO will no longer collect and treat the precipitation on the 750 and 904 pads. If there are any questions please contact Joe Wienand at 966-5926 or Steve Howard at 966-3040.

Sincerely,

Michael S. Karol
Michael S. Karol
Assistant Manager
for Facility Operations

Enclosures

cc w/Enc:
T. Lukow, RFO
F. Lockhart, RFO
T. Heydahl, EG&G
R. Morgan, EG&G
J. Roberts, EG&G

ADMIN RECORD

A-0010-000380

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE SECTION

NOV 16 10 15 AM '93

CORRES CONTROL x x
PATST/130G

Reviewed for Addressee
Corres. Control RFP

11-16-93
DATE BY

Ref Ltr. #

DOE ORDER # 5400-1

United States Government

Department of Energy

memorandum

Rocky Flats Office

DATE: JUN 26 1992 J

REPLY TO
ATTN OF: WMED:JAD:6782

SUBJECT: Regulation of Precipitation Runoff from Pads 750 and 950 at Rocky Flats Plant

TO: J. M. Kersh, Associate General Manager
Environment and Waste Management
EG&G Rocky Flats, Inc.

On May 19, 1992, the Rocky Flats Office (RFO) met with the Colorado Department of Health and the Environmental Protection Agency regarding the regulation of precipitation runoff from pads 750 and 904 at Rocky Flats Plant (RFP). As a result of that meeting, RFP will no longer need to treat captured pad runoff after agreed upon capital improvements are made and new pad management procedures are instituted. Therefore, we are requesting that EG&G take the following actions which must be completed before pad runoff can be directly discharged per agreement reached in the May 19th meeting.

1. Complete the scheduled capital improvements for the pads. These improvements include resealing the pad surfaces and berms, erecting tent 12, constructing berms at the tent doors and installing the new tent perimeter-to-pad seals.
2. Install gate valves or similar devices in the down slope section of the pad berms. The valves should be positioned to allow maximum drainage from the pads when open.
3. Maintain the improvements listed in 1. based upon manufacturer's recommendations, or more frequently if significant deterioration is observed.
4. Initiate the following additional pad management procedures after capital improvements have been completed:
 - triple rinse spill areas after spills are cleaned to background radiation levels by the current procedure,
 - collect and treat (in Building 374) all rinse water used to clean spills,
 - collect run on that accumulates in tents, and treat in Building 374, and
 - discharge collected pad runoff by manually opening pad gate valves only after a determination is made by the pad manager that the runoff has not been contaminated by a spill that was not cleaned.
5. Provide employee training for additional pad management procedures listed in item 4 above.


JUN 26 1992

6. Sample pad runoff after the capital improvements are completed and the additional management procedures have been fully implemented. Runoff should be sampled once before the first release and approximately every six months, depending upon precipitation events, until superseded by the routine sampling requirements specified in the new RFP National Pollutant Discharge Elimination System (NPDES) permit. Sample analyses should be submitted to RFO for concurrence to begin or continue releasing runoff.

7. In the interim (until capital improvements are completed, additional management procedures are implemented and permission to begin releasing runoff has been obtained from RFO), treat collected pad runoff in Building 374.

The above capital improvements should be completed prior to initiating the on-site reformulation of pondcrete and saltcrete by Halliburton. Please provide RFO with a schedule for completing the above items by July 30, 1992.

If you have any questions concerning this request please contact Tom Lukow of my staff at extension 4561.


James K. Hartman
Assistant Manager
for Environmental Management

cc
T. Lukow, WMED, RFO
M. Van Der Puy, WMED, RFO
J. Dion, WMED, RFO
D. Hauser, CSD, RFO

1. Deviation in Method to Achieve the Action Specified in Item 2

Item 2 specified the installation of a valve in the down slope section of each pad which would be in the normally open position to accomodate precipitation discharge but could be quickly closed in the event of a spill on the pad. It was decided to not penetrate the berm and install valves but to use existing pumps on the pads to remove the water over the berm. This achieves the same result as the gate valve; control of pad discharge in a spill situation.

2. Clarification to Item 6

Item 6 requires some clarification. It is the intent of RFP to honor all of the requirements specified in item 6. However, the new RFP National Pollutant Discharge Elimination Permit (NPDES) has not yet been issued. Therefore the routine sampling requirements and sample analysis will be in accordance with the existing plant surface water program requirements. When the NPDES permit is issued, we will sample in accordance with the permit.